

## **REMARKS/ARGUMENTS**

### **Status of the Claims**

Claims 1-21 and 27-42 are currently pending in the application. Claims 1, 15, 16, and 27 have been amended. No new matter has been added by the amendments. Claims 39-42 have been cancelled. No claims have been added. Therefore, claims 1-21 and 27-38 are present for examination. Claims 1, 15, 16, and 27 are independent claims.

### **35 U.S.C. §103 Rejection, Linehan et al. in view of D'Arbeloff et al.**

Claims 1-12, 14-19, and 27-42 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,327,578 B1 issued to Linehan ("**Linehan**") in view of U.S. Publ. No. 2003/0009382 A1 issued to D'Arbeloff, et al. ("**D'Arbeloff**").

Applicants submit that Linehan discloses a "method of doing business...for electronic commerce that includes the feature of a 'thin' consumer's wallet by providing issuers with an active role in each payment." (See Linehan at Abstract.) Linehan further discloses that "[w]hen a consumer is ready to buy something from a merchant on the internet using a credit or debit card, the consumer's computer sends a consumer payment request over *[an] internet path* to the merchant's computer." (See *Id.* at col. 3, ll. 15-19; emphasis provided.) Then, "[t]he merchant's computer forwards the consumer's payment request over internet path" and "the consumer's payment request [is sent] to the acquirer bank over *a private network path*." (See *Id.* at col. 3, ll. 20-26; emphasis provided.)

D'Arbeloff discloses "[a] method of handling electronic payments." (See D'Arbeloff at Abstract.) D'Arbeloff further discloses that the method includes "[i]dentifying and authenticating [a] user [which] include[s] loading a database in [a] payment gateway, determining whether an identification of the user is contained in the database, and determining whether the user's identification is authorized for the transaction. Routing may include loading a database in the payment gateway, loading a payment record of the user from the database,

selecting the one of the plurality of payment networks according to the payment record." (*Id.* at paragraph 0006).

In contrast, claim 1, and similarly claims 15, 16, and 27, as amended, recite that a "credential is *associated with a plurality of accounts* each with different account types the association maintained on behalf of the customer by the payment network, wherein the credential is *a universal payment mechanism* which allows the customer to maintain a single payment mechanism for the plurality of accounts each with a different account type." (Emphasis provided.) Applicants respectfully submit that neither Linehan nor D'Arbeloff teach or suggest such a feature. In other words, neither Linehan nor D'Arbeloff teach or suggest a credential (*e.g.*, an account representation instrument, presentation device, etc.) which is a universal payment mechanism, such that the single credential is associated with multiple financial accounts of different account types (*e.g.*, credit, ACH, debit, stored value, etc.). Hence, the single credential (or presentation instrument) allows a customer to consolidate all of their financial accounts of varying types into a single instrument. Nowhere in either Linehan or D'Arbeloff are Applicants able to find such a teaching or suggestion. Therefore, for at least these reasons, Applicants submit that claim 1, and similarly claims 15, 16, and 27 are patentable over Linehan in view of D'Arbeloff.

Furthermore, claims 2-12, 14, 17, 19, and 28-37 depend from independent claims 1, 16, and 27. Thus, by virtue of their dependence on an allowable independent claim, Applicants submit that claims 2-12, 14, 17, 19, and 28-37 are also allowable. Accordingly, Applicants respectfully request that this rejection be withdrawn.

**35 U.S.C. §103 Rejection, Linehan in view of D'Arbeloff and further in view of Cohen**

Claims 20 and 21 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Linehan in view of D'Arbeloff and further in view of U.S. Patent No. 6,422,462 B1 issued to Cohen ("Cohen").

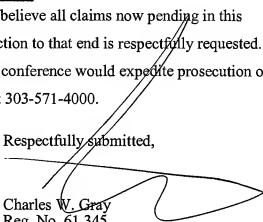
Claims 20 and 21 depend from independent claim 16. Thus, by virtue of their dependence on an allowable independent claim, Applicants submit that claims 20 and 21 are also allowable. Accordingly, Applicants respectfully request that these rejections be withdrawn.

**CONCLUSION**

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,

  
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